

PHILLIP A. TALBERT
United States Attorney
JESSICA A. MASSEY
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GURPREET SINGH BRAR,

Defendant.

CASE NO. 1:20-CR-00197-DAD-BAM

STIPULATION TO VACATE STATUS
CONFERENCE DATE, SET THE MATTER FOR
TRIAL, AND EXCLUDE TIME PERIODS UNDER
THE SPEEDY TRIAL ACT; AND ORDER

DATE: September 14, 2022
TIME: 1:00pm
COURT: Hon. Barbara A. McAuliffe

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on September 14, 2022.
2. The parties hereby request that the Court vacate the current status conference date, set this matter for trial on July 18, 2023, and exclude time between September 14, 2022, and July 18, 2023, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]. The parties further request a trial confirmation date be set for July 5, 2023.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government represents that the discovery associated with this case has been provided. The government is aware of its ongoing discovery obligations.
 - b) The parties are in plea discussions.

c) Counsel for defendant desires additional time to confer with his client about a possible resolution, to review discovery, and to otherwise prepare for trial.

d) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) The government does not object to the continuance.

f) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of September 14, 2022, to July 18, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 8, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ JESSICA A. MASSEY
JESSICA A. MASSEY
Assistant United States Attorney

Dated: September 8, 2022

/s/ YAN SHRAYBERMAN

YAN SHRAYBERMAN
Counsel for Defendant
GURPREET SINGH BRAR

FINDINGS AND ORDER

IT IS SO ORDERED that the status conference set for September 14, 2022, is vacated. A jury trial is set for **July 18, 2023, at 8:30 a.m. before District Judge Ana de Alba**. Estimated time of trial is **3 days**. A trial confirmation is set for **July 5, 2023, at 8:30 a.m. before District Judge Ana de Alba**.

Time is excluded through trial pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv). Time shall be excluded from September 14, 2022, through July 18, 2023, pursuant to 18 United States Code Section 3161(h)(7)(A), B(iv), to allow the parties to sufficiently prepare for trial and continue their plea discussions. The Court finds that the ends of justice outweigh the interest of the defendant and the public in a speedy trial.

IT IS SO ORDERED.

Dated: September 8, 2022

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE